

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TS MEDIA TECH IP, LLC,)
Plaintiff,) Case No. 2:11-cv-00181
v.) Jury
ASSOCIATED EQUIPMENT)
CORPORATION; BACCUS)
GLOBAL, LLC;FRONIUS USA, LLC;)
MIDTRONICS, INC.;THE NOCO)
COMPANY; PULSETECH)
PRODUCTS CORPORATION; RELAX)
TECHNOLOGY, INC. D/B/A GRANITE)
DIGITAL; and STANLEY BLACK &)
DECKER, INC.,)
Defendants.)

**STIPULATED MOTION FOR
DISMISSAL WITHOUT PREJUDICE**

Plaintiff, TS Media Tech IP, LLC and Defendant The NOCO Company (“NOCO”), by and through their undersigned counsel and pursuant to Fed. R. Civ. P. 41 (a)(2) and (c), hereby move for an order dismissing all claims and counterclaims between them in this action WITHOUT PREJUDICE, with each party to bear its own costs, expenses and attorneys’ fees.

Dated: January 24, 2012

Respectfully submitted,

/s/ Andrew W. Spangler
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ATTORNEYS FOR DEFENDANT
THE NOCO COMPANY

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on January 24, 2012. Any other counsel of record will be served by First Class U.S. mail on this same date.

/s/ Andrew W. Spangler
Andrew W. Spangler